



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
College Park, MD 20740

2274 '02 JUN 28 A9:15

JUN 17 2002

Mr. Robert C. Doster
Senior Vice President of Scientific Affairs
Enzymatic Therapy, Inc.
825 Challenger Drive
Green Bay, Wisconsin 54311-8328

Dear Mr. Doster:

This is in response to your letter of May 31, 2002 responding to FDA's letter to Enzymatic Therapy, Inc. dated April 9, 2002. Our letter to you was in response to your submission to FDA pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)) for the products "Migracare" and "MygraFree."

Thank you for your response to our letter. FDA will carefully consider the information in your letter regarding the claims being made for other products that marketed similar to your products that were the subject of our April 9, 2002 letter. With respect to the specific claims being made for the products that you provided information on, as a matter of policy, FDA does not provide comment on the appropriateness of specific products or claims made on a product's label or in its labeling to parties other than the responsible manufacturer. Therefore, we are unable to comment on the specific product-related information you provided. However, the agency will evaluate the information you provided, and respond in a manner appropriate to the findings of its evaluation and consistent with available resources and enforcement priorities.

However, we want to make clear that the fact that products may be available in the marketplace that bear claims in their labeling that cause them to be unapproved drugs does not change the status of the claims or the products under the Act. As we stated in our previous letter, 21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. A firm using such claims in the labeling of its dietary supplements does so at the risk that the agency may take enforcement action against that product without prior notice. As we have state, the agency believes that the claims you were making for your products, including the names of the products, evidenced that the products were intended to treat, cure, prevent, or mitigate migraine headache, a disease.

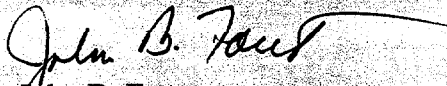
975-0163

LET 614

Page 2 - Mr. Robert C. Doster

Please contact us if we may provide you with further assistance or if you have further questions on this matter.

Sincerely,



John B. Foret

Director

Division of Compliance and Enforcement

Office of Nutritional Products, Labeling
and Dietary Supplements

Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200

FDA, Minneapolis District Office, Office of Compliance, HFR-SW340

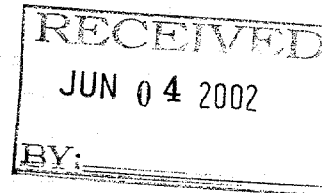
EnzymaticTherapy®
NATURAL MEDICINES™

Am 8
6/4/02

80747

May 31, 2002

Mr. John Foret
Division of Compliance and Enforcement
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, Maryland 20740-3835



Dear Mr. Foret:

We are writing to call your attention to dietary supplements on the market that have obvious derivations from "migraine" that serve to identify a population of consumers with a disease for which the products are intended.

Enzymatic Therapy, Inc. received a Courtesy letter dated April 9, 2002 regarding our products Migracare and MygraFree (copy attached). You referred Enzymatic Therapy, Inc. to CFR 101.93(g)(2)(iv)(A). You also stated that our products are intended to treat a disease, namely migraine headaches and that the use of the name of a disease or other words or terms related to a disease is an implicit claim that a product is intended to treat, prevent, or mitigate that disease. We are enclosing competitor information which does exactly the same, and would like an explanation as to how they are able to make such claims using a product name or term relating to a disease.

We bring this to your attention so that the FDA may properly address these issues and are looking forward to your response.

Sincerely,

Robert C. Doster
Senior Vice President of Scientific Affairs

Enclosure



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
College Park, MD 20740

APR - 9 2002

Dr. Robert C. Doster
Senior Vice President of Scientific Affairs
Enzymatic Therapy, Inc.
825 Challenger Drive
Green Bay, Wisconsin 54311

Dear Dr. Doster:

This is in response to your letters of March 14, 2002 and March 25, 2002 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submissions were for the products **Enzymatic Therapy Migracare®** and **PhytoPharmica MygraFree™**.

The products **Enzymatic Therapy Migracare®** and **PhytoPharmica MygraFree™** use the claim "Dietary supplement to support healthy circulation in the brain." This claim, used in conjunction with the names of the products, **Mygracare®** and **MygraFree™** is an implied claim that your products are intended to treat a disease, namely, migraine headaches. The use of the name of a disease or other words or terms related to a disease is an implicit claim that a product is intended to treat, prevent, or mitigate that disease. See 21 CFR 101.93(g)(2)(iv)(A). The terms **Migracare®** and **MygraFree™** are obvious derivations from "migraine" that serve to identify a population of consumers with a disease for which the products are intended. FDA considers a brand name that includes a disease name or a clearly recognizable derivation of a disease name to be a disease claim unless the context of the labeling as a whole makes clear that the name does not imply disease treatment or prevention because the product is intended for some other use. The names of these products, however, provide no indication of what other uses the products could be intended for and, moreover, include claims that are clearly related to one of the underlying predisposing clinical causes of migraine headaches. As such, the names of these products and the accompanying claims are disease claims.

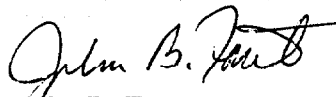
21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products suggest that they are intended to treat, prevent, or mitigate diseases. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products

Page 2 - Dr. Robert C. Doster

are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

Please contact us if we may be of further assistance.

Sincerely,



John B. Foret

Director

Division of Compliance and Enforcement

Office of Nutritional Products, Labeling

and Dietary Supplements

Center for Food Safety

and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200

FDA, Minneapolis District Office, Office of Compliance, HFR-MW240

Product Information



MigraDefense™



Description: MIGRA DEFENSE ò Butterbur has properties which significantly support cranial blood vessels. It is also a muscle relaxant. ò The Butterbur in this product is guaranteed to contain no more than 5 ppm of pyrrolizidine alkaloids. ò Feverfew inhibits the production of prostaglandins which constrict and dilate cerebral blood vessels. ò White Willow contains the glucoside, salacin. ò Guarana has been added to help decrease cranial blood flow. ò Griffonia (which supplies 5-Hydroxytryptophan) has been added as a serotonin precursor. ò This natural herbal product provides a new, safe alternative.

Item#: 67507

Size: 60ct

Suggested Retail Price: \$16.99

Directions: As a dietary supplement, take 2 Fast-Acting capsules as needed (up to four daily).

Serving Size: 2 Capsule 30 Servings per container

Ingredients:	Amount per serving:	% Daily Value: +
Magnesium (as magnesium oxide)	200 mg	50%
Organic Feverfew (Tanacetum Parthenium) (aerial) (Guaranteed to contain a minimum of 2mg [0.7%] parthenolide)	350 mg	~
Guarana (Paulina cupana) (seed)	200 mg	~
GP Butterbur (Petasites hybridus) (root extract) (Guaranteed to contain 15mg [15%] sesquiterpenes [petasin, petasol, neo petasol and isopetasol derivatives])	100 mg	~
White Willow (Salix alba) (bark)	100 mg	~

Key to Ingredients:

~ = Daily Value not established.

+ = Percent Daily Value is based on a 2,000 calorie diet.

Other Ingredients: Gelatin (capsule), cellulose

Other: See product label for more information.

[Click Here](#) to Return to the Search Results Page

[Click Here](#) to Search Again.

[Home](#) | [About Us](#) | [Investor Relations](#) | [Products](#) | [What's New](#) | [Education](#) | [Press](#) | [Site Map](#) | [Contact Us](#)

Information on this site is provided for informational purposes and is not meant to substitute for the advice provided by your own physician or other medical professional. This information is not intended to convey representations about any product, or to be used as labeling or advertising for any product, including any product sold by Nutraceutical Corporation or anyone else; you should not use the information contained herein for diagnosing or treating a health problem or disease, or prescribing any medication. You should read carefully all product packaging. If you have or suspect that you have a medical problem, promptly contact your health care provider.

Copyright and Disclaimer © 2002 Nutraceutical Corporation, 1400 Kearns Blvd., Second Floor, Park City, UT 84060. Call 800.669.8877. All rights reserved.

Search

iHerb.Com

Show Order

**Mygrafew (Feverfew), Nature's Way, 90 Tabs.**

Excerpted from Nature's Way product description:

**" MygraFew
5% Parthenolide
7X More Potent Than Other Extract
Superior Shelf Stability**

*Standardized Feverfew Extract
Helps maintain normal blood vessel tone.*

Studies at the London Migraine Institute have increased interest in the parthenolide in Feverfew for its role in maintaining normal blood vessel tone. Feverfew helps maintain normal blood vessel tone by reducing platelet aggregation, serotonin release from platelets and blocking the formation of pro-inflammatory mediators.

New improves Mygrafew provides the level of parthenolide recommended by both Canadian and British health authorities for optimal results. Each tablet provides the **recommended level of 600 mcg parthenolide** in a once daily dosage.

New high potency Mygrafew is standardized to **5% parthenolide - 7X more potent** than other feverfew extracts.

Mygrafew is the only feverfew extract with guaranteed parthenolide stability for **three years**.

Mygrafew is free of common food allergens such as yeast, milk, lactose, wheat, sugar, soy or corn.

Supplement Facts:**Serving Size 1 Tablet****Servings Per Container 90**

Amount Per 1 Tablet	%DV
Feverfew, dried extract (leaf) 12 mg	**
12 mg standardized feverfew extract delivering 600 mcg parthenolide (5% parthenolide).	

** Daily value not established.

Other Ingredients:

Dicalcium phosphate, cellulose, modified starch, modified cellulose, magnesium stearate, silica.

Recommended Use:

Take one tablet daily with water. Best results are obtained with continuous use.

Caution:

Not recommended for use by pregnant or lactating women or by children under two years of age. Certain individuals may experience oral discomfort or irritation when using this product. If irritation occurs, discontinue use immediately."

Expiration date: Approximately 2 years after the date of purchase.

Brand: Nature's Way

Home
New & Hot Products!
BRAND LIST
CONDITIONS
VITAMINS
HERBS
BODY CARE
Glossary
Reading Room
Shipping Info

[Shopping Cart](#)[Info](#)[Search](#)

MygrAid Formula, 60 Cap

MygrAid Formula

Description: Advanced blend of current scientific research and traditional herbal medicine. Key ingredients include Feverfew extract and magnesium amino acid chelate, a superior form with improved absorption.

Usage: Mygraid uses Feverfew, to provide the active parthenolide proven to help maintain normal blood vessel tone by reducing platelet aggregation, serotonin release from platelets and blocking the formation of pro-inflammatory mediators. Magnesium, essential for proper muscle function, and, Lavender and Linden Flowers, traditionally used by Europeans for head comfort.

Recommended Daily Dosage: Take one capsule three times daily with water, preferably with food.

The following list is for serving size of 1 capsule: Feverfew Leaves 100mg, Feverfew, dried extract 33.3mg, Lavender Flower 50mg, Linden Leaf & Flower 70mg, Magnesium Amino Acid Chelate 33.3mg, from Nature's Way.

NWMAFR Regular price: \$7.99 Smartbomb price: ~~\$4.79~~

[Add to Cart](#)
[Search](#)

FREE SHIPPING ON DOMESTIC ORDERS OVER \$100.00!!

Check out our [Glossary](#), or [Reading Room](#) for an extensive selection of reference materials.

[Home Shipping Info](#)

No sales to persons under the age of 18. If you are under 18 please click here.
Many items sold on Smartbomb.com may interact adversely with those who have high blood

pressure, are pregnant, lactating, have specific health ailments or are on MAO inhibitors and other medications. When purchasing herbs, vitamins, medicines, food supplements or drugs please consult your physician and read all labels and instructions. If you have any questions please email us or call us toll free at 1-800-425-3115.

Statements made on Smartbomb.com have not been approved by the FDA. Smartbomb.com does not intend to diagnose, treat or cure any disease. We do not intend to make health claims of any kind. When purchasing herbs, vitamins, medicines, food supplements or drugs please consult your physician.

Copyright 1996-2000 smartbomb.com all rights reserved and all lefts open to interpretation. Any and all recurrences will be noted and fed back to you at random intervals.

[Search](#)[iHerb.Com](#)[Show Order](#)**Feverfew Leaves, Nature's Way, 180 Capsules****" FEVERFEW LEAVES, Nature's Way, 180 Capsules**

Our Feverfew is certified organically grown by Trout Lake Farm, Washington, and harvested at their peak natural potency of .2% parthenolide. It is the same strain of Feverfew used in the studies at the London Migraine clinic.

Usage: Feverfew helps maintain normal blood vessel tone. Parthenolide also helps normalize the functions of platelets in the blood system by inhibiting platelet aggregation, reducing serotonin release from platelets and blocking the formation of pro-inflammatory mediators.

Recommended Daily Dosage: As an addition to the daily diet, take one capsule three times daily, preferably with food. Best results are obtained with continuous use.

The following list is for serving size of 1 capsule

Primary Ingredients	Amount	USRDA
Feverfew Leaves	380 mg	0%

Other Ingredients: Gelatin "

Expiration date: Approx. 2 years after the date of purchase.

Sizes & Suggested Retail Price
180 capsules - \$15.49

NW-12808 8.50, 4 for \$31.00, 12 for \$87.00

[Click here to order](#)**iHerb Store**[Herbs](#)[Amino Acids](#)[Vitamins, Minerals](#)[Specialty Supplements](#)[Brands](#)[Condition Spe](#)

Search iherb for:

[Search](#)

Call us toll-free at 1-888-792-0028 (1-626-358-5678).
Extra Discount for on-line orders. [Click here](#)

[About iHerb.com](#)[Contact](#)[News at iHerb](#)[Testimonials](#)
[Order](#)[Privacy Policy](#)[International](#)[Sho](#)

(last update: 03-02)

(last update: 05-02)

[Your Account](#)[About your account](#)

Disclaimer: Statements made, or products sold through this web site, have not been evaluated by the Food and Administration. They are not intended to diagnose, treat, cure, or prevent any disease.

Copyright © 1997-2002 iHerb Inc.

Last update: 05-30-2002 (6:00 pm)

[Click Here for
Live Help](#)

Positively the best value in the world ! [Click here](#)

Free shipping for orders over \$60.00. How fast do we ship out your order? [Click here](#)

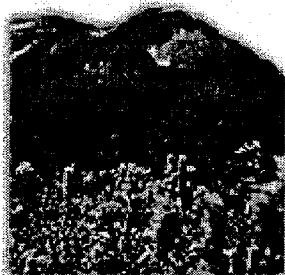
New: Free On-line Herbal Encyclopedia! [Click here](#)



Trust The Leaf™

About Nature's Way

Company Summary



Located in the mountain valley of Springville, Utah, Nature's Way® is America's natural healthcare leader---specializing in the highest quality of natural medicines. Every product that bears the green Nature's Way leaf exceeds the most rigorous quality standards and testing procedures in the natural products industry. As a result, Nature's Way is more than just a range of products millions of people around the world use. It's the name they trust.

In total, Nature's Way provides over 350 products, including single herbs and herbal formulas, standardized herbal extracts, clinically proven phytochemicals, vitamins, minerals, probiotics, homeopathy, specialty formulas and all-natural over-the-counter medicines (OTCs). Operating from a 250,000 square-foot, pharmaceutical licensed manufacturing facility, we produce the world's highest quality natural healthcare supplements. In addition, we actively support worldwide environmental programs, use recycled packaging materials and sponsor alternative healthcare education.



Mission Statement

Our Mission is to benefit the quality of human health and promote positive health care choices by developing, manufacturing, and marketing preventative, curative and nutritive health care products of natural origin.

10 Mountain Springs Parkway • Springville, Utah 84663
801/489-1500 • Fax: 801/489-1700

Search

iHerb.Com

Show Order



Headache Relief, New Chapter, 30 Softgels.

Label Information:

" Headache Relief, New Chapter, 30 Hexane-Free Softgel Capsules

Full spectrum parthenolides from supercritically extracted feverfew, supporting normal cerebral vascular blood flow

25% naturally occurring Salicylic acid extracted from nature's most effective herbal salicin source

- High potency californidine source from natural poppy extracts
- Blocks the formation of inflammatory prostaglandins

A Supercritical New Chapter in Headache Relief

New Chapter's Headache Relief provides a potent and effective herbal method for achieving relief from one of life most common and unpleasant stressful experiences. Scientific research has clearly identified that the parthenolid within the feverfew flower have singular value in providing headache relief. New Chapter's exclusive supercritical CO2 extraction creates a uniquely high potency and stable parthenolide content enhanced with an array of nature best recognized and synergistic herbs to promote comfort and release from the common headache.

New Chapter's Supercritical Herbal Extracts "Supercritical" means Super Purity, Super Potency, Broad Spectrum, and **No Chemical Solvents**. We take nature's finest herbs and then extract and highly concentrate (a high as 250 to 1) their precious, full spectrum ingredients. We do not isolate single ingredients or spike our extract with synthesized additives. We deliver the wisdom of nature, with the complexity and organic nuances of the natural herb preserved for you. In fact, the supercritical process extracts more beneficial organic antioxidants and other compounds than any other extraction processes. And when you take New Chapter's supercritical extracts, neither you nor the environment, have to contend with chemical solvents.

Supplement Facts

Serving size 1 Softgel

Serving per container 30

One Softgel Contains

Feverfew (stem, leaf & flower), supercritical extract, (1% parthenolide-1.25 mg)	125 mg
Green Tea (leaf), extract, (50% polyphenols-50 mg) (7% caffeine)	100 mg
Wintergreen (leaf), extract, salicylic acid derivatives	75 mg
Ginger, SBSC* (rhizome), certified organic, (minimum 20% pungent compounds-10 mg, 4% zingiberene-2 mg)	50 mg
Meadowsweet (herb), extract, salicylic acid derivatives	38 mg
Purple willow (bark), (Salix purpurea), extract, salicylic acid derivatives	38 mg
California Poppy (whole plant), extract 5:1 (leaf & essential oil), supercritical extract (23% total phenolic antioxidants [TPA] -2.3~mg)	20 mg
Rosemary (leaf & essential oil), supercritical extract (23% total phenolic antioxidants [TPA]-2.3mg)	10 mg
Ginger (rhizome), certified organic (post-supercritical ethanolic extract) (3% pungent compounds-0.3mg)	10 mg
Lavender (flower), supercritical extract (25% linalool-2.5 mg)	10 mg
Hops (strobiles), supercritical extract (35% humulones-1.7 mg) (12% lupulones-0.6 mg)	5 mg
Valerian (root), (Valeriana officinalis & Valerians mexicanus) supercritical extract, (60% valepotriates-3mg)	5 mg

Other ingredients: olive oil-certified organic, yellow beeswax

Capsule: gelatin, vegetable glycerine, purified water, carob

Our premium softgel capsules are prepared without any chemical solvents and are certified Kosher, Halal and prion free.

Warning: Women who are pregnant or contemplating pregnancy should consult with their health care provider before taking this product. "

Brand: NewChapter
30 Hexane-Free Softgel Capsules

Expiration Date: Approx. 2 years from the date of purchase.

Suggested Retail Price: \$21.95

iHerb Price: 35-45 % Off Suggested Retail Price. Always !

NC-4071 14.00, 4 for \$52.00, 12 for \$144.00

[Click here to order](#)

iHerb Store

[Herbs](#)

[Amino Acids](#)

[Vitamins, Minerals](#)

[Specialty Supplements](#)

[Brands](#)

[Condition Spe](#)

Search iherb for:

[Search](#)

Call us toll-free at 1-888-792-0028 (1-626-358-5678).

Extra Discount for on-line orders. [Click here](#)

[About iHerb.com](#)

[Contact](#)

[News at iHerb](#)

[Testimonials](#)

[Privacy Policy](#)

[International](#)

[Sho](#)

[Order](#)

(last update: 03-02)

(last update: 05-02)

[Your Account](#)

[About your account](#)

Disclaimer: Statements made, or products sold through this web site, have not been evaluated by the Food and Administration. They are not intended to diagnose, treat, cure, or prevent any disease.

Copyright © 1997-2002 iHerb Inc.

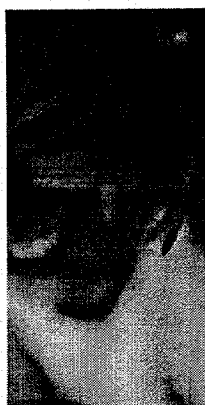
Last update: 05-30-2002 (6:00 pm)

[Click Here for
Live Help](#)

Positively the best value in the world ! [Click here](#)

Free shipping for orders over \$60.00. How fast do we ship out your order? [Click here](#)

New: Free On-line Herbal Encyclopedia! [Click here](#)



Your Name

E-mail Address

Contact Phone Number

Mailing Address

Please let us know how
we can help you!

Send

**Corporate Headquarters
and National Sales
Coordinator**

22 High Street
Brattleboro, VT 05301

(800) 543-7279

Fax: (800) 470-0247

info@new-chapter.com

Marketing & Public Relations

2000 Estrella Road

Prescott, AZ 86305

(928)717-6018

Fax (928)7176019

Toll Free: (877) 388-2692

pr@new-chapter.com

Luna Nueva Farm
La Tigra, Costa Rica
orgbot@sol.racsa.co.cr



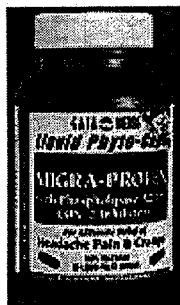
[Products](#) | [Luna Nueva](#) | [Research](#) | [Where to Buy](#) | [Contact Us](#) | [Media](#)

General Information can be obtained by e-mailing info@new-chapter.com

Search

iHerb.Com

Show Order

**Migra-Profen, Gaia Herbs, 60 Liquid Veggie Caps**

Label information:

" Migra - Profen, Gaia Herbs, 60 Liquid-Filled Capsules
Liquid Phyto - Caps
 with Phospholipase A2 and COX-2 Inhibitors
 For Ultimate Relief of Headache Pain & Cramps
100% Vegetarian
 A Dietary Supplement

Liquid Phyto Caps - Gaia Herbs' patented technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

Ecologically Wildcrafted • Certified Organic

Supplement Facts**Serving Size 1 Capsule****Servings Per Container 60**

	Amount per 2 Capsules	mg
Calories	14	
Alcohol Free Concentrated Extract Of:		
Feverfew leaf (<i>Tanacetum parthenium</i>) *	300 mg	+
Ch. Skullcap root (<i>Scutellaria baicalensis</i>) ***	110 mg	+
Kava Kava (<i>Piper methysticum</i>) **	70 mg	+
Valerian root (<i>Valeriana officinalis</i>) *	30 mg	+
Jamaican Dogwood bark (<i>Piscidia erythrina</i>) **	20 mg	+
Rosemary leaf, Supercritical Extr. (<i>Rosmarinus off.</i>)**	8 mg	+
Ginger rhizome,		
Supercritical CO2 Extract (<i>Zingiber off.</i>) **	8 mg	+
Standardized To Full Spectrum Activity Profile		
Bioactivity Per 2 Capsules		mg Activity
55% Kavalactones (from Kava Kava)	38.5 mg	+
0.5% Parthenolide (from Feverfew)	1.2 mg	+

+ Daily Value not established.

*Certified Organic

**Ecologically Wildcrafted

***Untreated Chinese Origin

Other Ingredients: Vegetable glycerin, vegetable cellulose.

Each 2 Capsules contain 5,000 mg crude herb equivalent.

Suggested Serving: Take 2 capsules with a small amount of warm water at the onset of pain and repeat 2-3 time at 15 minute intervals.

Caution: Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality. "

Expiration Date: Approx. 3 years from the date of the purchase.

Brand: Gaia Herbs
60 Liquid - Filled Capsules

Read more about this product at [Gaia Herb's Web Site](#).

Suggested Retail Price: \$ 27.95

iHerb Price: 30-40 % Off Suggested Retail Price. Always!

GH-9880 21.00, 4 for \$78.00, 12 for \$218.00

[Click here to order](#)

iHerb Store

[Herbs](#)

[Amino Acids](#)

[Vitamins, Minerals](#)

[Specialty Supplements](#)

[Brands](#)

[Condition Spe](#)

Search iherb for:

[Search](#)

Call us toll-free at 1-888-792-0028 (1-626-358-5678).

Extra Discount for on-line orders. [Click here](#)

[About iHerb.com](#)

[Contact](#)

[News at iHerb](#)

[Testimonials](#)

[Privacy Policy](#)

[International](#)

[Sho](#)

[Order](#)

(last update: 03-02)

(last update: 05-02)

[Your Account](#)

[About your account](#)

Disclaimer: Statements made, or products sold through this web site, have not been evaluated by the Food and Administration. They are not intended to diagnose, treat, cure, or prevent any disease.

Copyright © 1997-2002 iHerb Inc.

Last update: 05-30-2002 (6:00 pm)

[Click Here for
Live Help](#)

Positively the best value in the world ! [Click here](#)

Free shipping for orders over \$60.00. How fast do we ship out your order? [Click here](#)

New: Free On-line Herbal Encyclopedia! [Click here](#)

Gaia Herbs Inc.

Tel: 828-884-4242

Fax: 828-884-8967

Customer Service

Tel: 1-800-831-7780

Fax: 1-800-717-1722

Mailing address:

Gaia Herbs Inc

108 Island Ford Road

Brevard, NC 28712 USA



Email us your comments and questions:

VOB@gaiaherbs.com

Suzannes.com

Herbs, Vitamins, Homeopathy, Sports Nutrition, Weight Loss, Beauty and More

Product SearchSearch by name,
manufacturer, ingredient or
symptom**Aromatherapy**Essential Oils, Carrier Oils,
Candles, Ear Candles**Bath & Shower**Exfoliants & Loofah, Hair
Care, Massage Products,
Soaps, Toiletries &
Accessories**Body & Skin Care**Acne, Bug Bites & Rashes,
Cosmetics, Hair, Lips,
Sun Care, Moisturizers**Healthy Ways of Living**Ayurveda, Dr. Atkins, Eat
Right 4 Your Type, Pilates
Greens, Books, Yoga**Herbs**Tinctures, Suzanne's,
Solaray, Echinacea, Garlic,
Ginkgo Biloba, Ginseng,
Kava Kava, St. John's Wort,
Organic**Homeopathy**Boericke and Tafel, Boiron,
Lehning**Minerals**Calcium, Chromium, Iron,
Magnesium, Manganese,
Multiminerals, Potassium,
Zinc, more...**Natural Foods**Healthy Snacks, Herbal
Teas, Stevia, Kashi**Specialty Supplements**Antioxidants, Probiotics, Bee
Pollen, Glucosamine, Lutein,
MSM, Royal Jelly**Sports Nutrition**Amino Acids, Creatine, HGH,
Protein Supplements, Bars,
Shakes, Fat Burners**Vitamins**

Vitamins, Multivitamins

Weight LossCarb Blocker, Fat Burner,
Cellulite Fighters, Thyroid
Support, Appetite Control**Pet Products**

for Cats & Dogs

MigraGard® (30 capsules)MigraGard® by Solaray contains the world's number one Feverfew.
The high potency Feverfew (.7% parthenolide) in MigraGard® is
certified organic.Feverfew contains a range of compounds known as sesquiterpene
lactones. Over 85% of these are a compound called parthenolide.
Parthenolide helps prevent excessive clumping of platelets and inhibits
the release of certain chemicals, including serotonin and some
inflammatory mediators. According to migraine patients, feverfew
reduces the severity, duration, and frequency of migraine headaches.**Ingredients - per capsule:**

- Feverfew (Tanacetum parthenium) (leaves) (Guaranteed 2.45 mg [0.7%] parthenolide) 350 mg
- Feverfew (Tanacetum parthenium) (leaf) (Guaranteed 2.45 mg [0.7%] parthenolide) 350 mg

Other Ingredients: Gelatin (capsule), Feverfew Leaves and
magnesium stearate Gelatin (capsule), Feverfew (leaves) and
magnesium stearate**Solaray>MigraGard® (30 capsules)**

8330 Retail price: \$9.99 Suzannes.com price: \$6.45

Add to Your Basket**Solaray>MigraGard (60 Capsules)**

8332 Retail price: \$15.49 Suzannes.com price: \$9.95

Add to Your Basket**Natural Health Products****Health Concerns****Natural Products**Anxiety
Arthritis
Children's Health
Cold & Flu
Impotence
Menopause**More...****Health Concerns****Brand Names**Burt's Bees
Dr. Atkins
Enzymatic Therapy
Nature's Secret
Nature's Sunshine
Solaray
Suzanne's
Twinlab
Zia Natural Skin Care**More...****Brand Names****Free Ship**

on all US orders over \$50



Check out some of our
other brands:

Solaray
KAL
NaturalMax

VegLife
Premier One
Sunny Green
Thompson

Natural Sport
Action Labs
ActiPet
Ultimate Nutrition

[Home](#) | [About Us](#) | [Investor Relations](#) | [Products](#) | [What's New](#) | [Education](#) | [Press](#) | [Site Map](#) | [Contact Us](#)

For questions or comments about our products, e-mail: products@nutraceutical.com

Information on this site is provided for informational purposes and is not meant to substitute for the advice provided by your own physician or other medical professional. This information is *not* intended to convey representations about any product, or to be used as labeling or advertising for any product, including any product sold by Nutraceutical Corporation or anyone else; you should not use the information contained herein for diagnosing or treating a health problem or disease, or prescribing any medication. You should read carefully all product packaging. If you have or suspect that you have a medical problem, promptly contact your health care provider.

Copyright and Disclaimer © 2002 Nutraceutical Corporation, 1400 Kearns Blvd., Second Floor, Park City, UT 84060. Call 800.669.8877. All rights reserved.



Life'sVigor.com
HEALTH & BEAUTY CARE PRODUCTS



• Help Service • Search Site • Shop by Brand • Shop by Category • View Cart • CheckOut • About Us

Nature's Herbs

Migracin - Certified Potency 60 Capsule



[View All Nature's Herbs Products](#)

Retail Price: ~~\$12.99~~

Your Price: \$ 7.98

Item # 042591

1

Add to Cart

Description: Migracin is an herbal formulation that may be used to prevent migraine headaches and ease pain.

Instructions: As a dietary supplement for adults, take 2-6 capsules daily.

Additional Info: Our exclusive FreshCare System inhibits normal plant oxidation, maintaining product potency and extending freshness. It includes all-natural antioxidants in each capsule, oxygen-absorbing packets in each bottle, special air-tight seals and amber glass packing for uncompromised quality. Migracin is a natural-source supplement containing Power-Extract of Feverfew (Tanacetum parthenium), Certified Potency Extract of

White Willow (*Salix alba*) and DLPA (DL-Phenylalanine, an important amino acid). The Certified Potency Extract of White Willow adheres to stringent quality standards for potency and content of Salicin (active ingredient found naturally in Willow) assuring you of the same dependable quality every time. This Certified Potency symbol is your guarantee of dependable consistent quality and potency in every capsule every time! Only from Nature's Herbs.

Ingredients: Power-Extract of Feverfew 4:1 (equivalent to 200mg of fresh feverfew)...50mg, Certified Potency Extract of White Willow Bark (standardized for 15% Salicin)...30mg, Power-Extract 5:1 and powder of White Willow Bark (equivalent to 1700mg fresh Willow)...500mg, DLPA (DL-Phenylalanine)...250mg, Aromatic Natural Herbal Essential Oils

**** Disclaimer:** These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Manufacturers continually change product specifications. While we try our best to keep product descriptions up to date, they do not necessarily reflect the latest information available from the manufacturer. We are not responsible for incorrect or outdated product descriptions and/or images. Please read our [disclaimer](#).

[↑ back to top](#)

[Store Home](#) | [About Us](#) | [Help & Customer Service](#) | [Shop by Brand](#) | [Shop by Category](#) | [Index A](#) | [Index B](#)

© 1998 - 2002 Life's Vigor Health & Beauty Care. All rights reserved. 1-661-589-1818
13916 Searspoint Ave Bakersfield CA 93312. Email: service@lifesvigor.com

The products and the claims made about specific products on or through this site have not been evaluated by Lifesvigor.com or the United States Food and Drug Administration and are not approved to diagnose, treat, cure or prevent disease. The information provided on this site is for informational purposes only and is not intended as a substitute for advice from your physician or other health care professional or any information contained on or in any product label or packaging. You should consult with a healthcare professional before starting any diet, exercise or supplementation program, before taking any medication, or if you have or suspect you might have a health problem. Information about each product is taken from the labels of the products or from the manufacturer's advertising material. Life's Vigor is not responsible for any statements or claims that various manufacturers make about their products. We cannot be held responsible for typographical errors or product formulation changes. By using this service, you accept the terms of our [disclaimer](#). Please read it.



Life'sVigor.com
HEALTH & BEAUTY CARE PRODUCTS



• [Help Service](#) • [Search Site](#) • [Shop by Brand](#) • [Shop by Category](#) • [View Cart](#) • [CheckOut](#) • [About Us](#)

Nature's Herbs

Migracin Plus - Certified Potency 30 Softgel



[View All Nature's Herbs Products](#)

Retail Price: ~~\$9.99~~

Your Price: \$ 6.14

Item # 042836

1

Add to Cart

Description: Migracin Plus is suggested for the pain relief of migraine headaches.

Instructions: Take 2 capsules daily, preferably 1 with morning and evening meals.

Additional Info: Nature's Herbs, Certified Potency Power-Herbs Migracin Plus. Our exclusive FreshCare System inhibits normal plant oxidation, maintaining product potency and extending freshness. It includes all-natural antioxidants in each capsule, oxygen-absorbing packets in each bottle, special air-tight seals and amber glass packaging for uncompromised quality. This Certified Potency symbol is your guarantee of dependable consistent quality and potency in every capsule every time! Only from Nature's Herbs. Migracin Plus is a natural-source supplement containing Certified Potency Feverfew (tanacetum parthenium). A rich source of Sesquiterpene lactones, including a substance

called parthenolide, Migracin Plus uses standardized, stabilized Feverfew Extract assuring consistent potency of parthenolide in every softgel. In addition, Certified Potency White Willow Bark (standardized for salicin) and Magnesium have been added in just the right balance for a powerful, effective formula. Each softgel is preservative-free. Nature's Herbs, The Power to Feel Your Best! Since 1969.

Ingredients: Certified Potency Feverfew extract (standardized for 150mcg sesquiterpene lactones)...10.5mg, Certified Potency White Willow Bark Extract (standardized for 15% salicin)...25mg, Ginger Root Extract (standardized for 5% gingerols)...25mg, Magnesium...200mg, Vitamin E (d-alpha tocopherol)...400iu

**** Disclaimer:** These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Manufacturers continually change product specifications. While we try our best to keep product descriptions up to date, they do not necessarily reflect the latest information available from the manufacturer. We are not responsible for incorrect or outdated product descriptions and/or images. Please read our [disclaimer](#).

[↑ back to top](#)

[Store Home](#) | [About Us](#) | [Help & Customer Service](#) | [Shop by Brand](#) | [Shop by Category](#) | [Index A](#) | [Index B](#)

© 1998 - 2002 Life's Vigor Health & Beauty Care. All rights reserved. 1-661-589-1818
13916 Searspoint Ave Bakersfield CA 93312. Email: service@lifesvigor.com

The products and the claims made about specific products on or through this site have not been evaluated by Lifesvigor.com or the United States Food and Drug Administration and are not approved to diagnose, treat, cure or prevent disease. The information provided on this site is for informational purposes only and is not intended as a substitute for advice from your physician or other health care professional or any information contained on or in any product label or packaging. You should consult with a healthcare professional before starting any diet, exercise or supplementation program, before taking any medication, or if you have or suspect you might have a health problem. Information about each product is taken from the labels of the products or from the manufacturer's advertising material. Life's Vigor is not responsible for any statements or claims that various manufacturers make about their products. We cannot be held responsible for typographical errors or product formulation changes. By using this service, you accept the terms of our [disclaimer](#). Please read it.



Life'sVigor.com
HEALTH & BEAUTY CARE PRODUCTS



• [Help-Service](#) • [Search Site](#) • [Shop by Brand](#) • [Shop by Category](#) • [View Cart](#) • [CheckOut](#) • [About Us](#)

Nature's Herbs

Willowprin Max - Certified Potency 30 Capsule



[View All Nature's Herbs Products](#)

Retail Price: ~~\$ 10.79~~

Your Price: \$ 6.63

Item # 042489

1

Add to Cart

Description: Willowprin contains White Willow Bark (Salix Alba) which has analgesic and anti-inflammatory properties and may alleviate pain, reduce fevers, help arthritis, rheumatism, diarrhea, pain, inflammation, heart disease, and delay cataract formation.

Instructions: As a dietary supplement, adults take 2-3 capsules every four hours as desired up to 18 capsules per day.

Additional Info: The highest quality, most potent and most effective form of White Willow Bark extract available. It is standardized at the highest concentration of naturally-balanced active principles while retaining and enhancing all the whole-plant synergistic benefits and is one of the world's finest and purest plant extracts. Faster-acting and more assimilable than ordinary White Willow.

Ingredients: Certified Potency White Willow Bark Extract...200mg (concentrated and standardized at 15% salicin (a natural constituents), equivalent to about 4000mg of Dry White Willow Bark , White Willow Bark 5:1...500mg (equivalent to 2500mg of white willow) White Willow Bark...200mg

**** Disclaimer:** These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Manufacturers continually change product specifications. While we try our best to keep product descriptions up to date, they do not necessarily reflect the latest information available from the manufacturer. We are not responsible for incorrect or outdated product descriptions and/or images. Please read our [disclaimer](#).

[↑ back to top](#)

[Store Home](#) | [About Us](#) | [Help & Customer Service](#) | [Shop by Brand](#) | [Shop by Category](#) | [Index A](#) | [Index B](#)

© 1998 - 2002 Life's Vigor Health & Beauty Care. All rights reserved. 1-661-589-1818
13916 Searspoint Ave Bakersfield CA 93312. Email: service@lifesvigor.com

The products and the claims made about specific products on or through this site have not been evaluated by Lifesvigor.com or the United States Food and Drug Administration and are not approved to diagnose, treat, cure or prevent disease. The information provided on this site is for informational purposes only and is not intended as a substitute for advice from your physician or other health care professional or any information contained on or in any product label or packaging. You should consult with a healthcare professional before starting any diet, exercise or supplementation program, before taking any medication, or if you have or suspect you might have a health problem. Information about each product is taken from the labels of the products or from the manufacturer's advertising material. Life's Vigor is not responsible for any statements or claims that various manufacturers make about their products. We cannot be held responsible for typographical errors or product formulation changes. By using this service, you accept the terms of our [disclaimer](#). Please read it.

Fax: (801) 763-0789

Nature's Herbs
600 East Quality Drive
American Fork, UT 84003

Herbal or tea related inquiries

village@naturesherbs.com

Phone: (800) 437-2257
Fax: (801) 763-0789

© 2001 Twin Laboratories Inc. All Rights Reserved. [Privacy Statement](#) | [Terms of Use](#)



www.VitaminShoppe.com

My Account

My cart contains 0
items

View Cart

Checkout

Vitamins & Supplements /
Herbal & Homeopathic ProductsSports Nutrition
ProductsPersonal Care
ProductsMy
Health

Bookstore

Learning
Center

>Home >Advanced Search >Search Results >Pain Stop

Welcome

Sign In / Register**Search**
 go

Find products, brands
and information

Order By Item #

Quick Reorder

Help

Store Locator

Security Guaranteed

40% Off
All Books

Click here >>

**Frequently
Asked
Questions**
 Click here >>

Pain Stop

FLORADIX

Brand: Flora, Inc

Item # : FL-1047

Availability: This item is currently backordered and usually ships in 3-10 business days. Please use the Search Box (to your left, below Sign In/Register) to see if we have the item available in other sizes.

Pain stop: traditional headache and pain remedy

Dose: 2 capsules (1000 mg)

Doses per container 15

Suggested use:

Adults: 2 to 4 vegicap capsules as needed, up to 3 times
Daily, preferably with food.

Ingredients:

Willow bark extract

Willow bark powder in vegetarian capsule.

Product Details

Strength	Size	Retail	Our Price	Save	Qty	
500 Mg	30 Each (Veggie Capsules)	\$10.95	\$7.12	35%	1	Add to Cart

DEPARTMENTS

[Vitamins & Supplements](#)[Herbal & Homeopathic](#)[Sports Nutrition and Life](#)[Personal Care](#)[My Health](#)[Bookstore](#)[Learning Center](#)

ORDERING

[Shopping Cart](#)[My Account](#)[Order History](#)[Quick Reorder](#)[Order By Item #](#)

SERVICES

[Store Locator](#)[Catalog Request](#)[Gift Certificates](#)

ASSISTANCE

[Help/Customer Support](#)[Contact Us](#)[About Us](#)[Legal Info](#)[Privacy & Security](#)